



Government of **Western Australia**
Department of **Commerce**

Water Forever
Water Corporation
Locked Bag 2
Osborne Park Delivery Centre WA 6916

Dear Sir/Madam

Water Forever: Directions for our water future draft plan

The Building Commission welcomes the opportunity to submit comments to the *Water Forever: Directions for our water future* draft plan.

In delivering our comments, we acknowledge the part that the building sector has to play in increasing water efficiency in building and continually reducing water wastage. We fully endorse the plan and look forward to working with the Water Corporation in implementing the plan.

The attached submission details our position on the draft plan.

Yours sincerely,

Peter Gow

Executive Director
Building Industry Development/Building Commission
Department of Commerce

Water Forever: Directions for our water future draft plan

Submission from the Building Commission

The Building Commission notes that 'Directions for Our Water Future' often mentions building codes and also the '5 Star Plus' initiative – mainly in Section 3 'Reducing Water Use'.

We agree that buildings, both commercial and residential, have a key role to play in reducing our water use into the future. We welcome and encourage you to involve the Building Commission in the development of water efficiency measures that interact with buildings.

We support the targets for recycling and scheme water use reduction. With current science and the fact that global emissions are tracking above worst case scenarios by the IPCC, the Building Commission believes that the targets should be considered minimums and not maximums. This is due to an increasing probability that Perth and the South West of Western Australia will face significantly reduced rainfall in the period to 2050 and beyond.

The document mentions 5 Star Plus by name (p38) and that the Water Corporation supports the potential expansion of the initiative into commercial buildings. To avoid confusion it is worth noting the extent of those regulations. The Building Commission (ex-Department of Housing and Works) implemented 5 Star Plus in September 2007. It covers water and energy measures for new residential buildings.

5 Star Plus requires low greenhouse hot water systems, which must be either a:

- Solar hot water system;
- 5 star gas system; or
- Heat pump system.

And also

- Water efficient fixtures and fittings – 3 star WELS rated showerheads, 4 star WELS rated taps (except bath and garden taps) and 4 star WELS rated dual-flush toilet;
- Swimming pool and spa covers; and
- The pipe from a hot water system to the furthest hot water outlet cannot be more than 20 metres long, or 2 litres internal volume.

5 Star Plus only applies to new-build class 1 or 10 buildings (i.e. houses, units, terraced housing). It does not apply to existing class 1 or 10 buildings. There is a proposed mechanism to improve the efficiency of existing buildings, known as mandatory disclosure. This will require owners and landlords to assess their property and publish the appropriate rating to prospective buyers/renters.

The Building Commission notes on page 38 of the Water Forever document the proposal to extend the current 5 Star Plus initiative into commercial buildings. We would like to work with you on the initial scoping of this initiative. A key issue is understanding the cost/benefit relationship, as this was the major factor in not proceeding with Stage 2 of 5 Star Plus for residential buildings.

'Directions for Our Water Future' is a very good outline of how we should be managing our decreasing water resources and the Building Commission look forward to working proactively with the Water Corporation in the future.

The Building Commission background

The Building Commission will become an official entity on 1 July 2009 as a branch of the Department of Commerce. It will bring together the Plumbers Licensing Board, the Builders and Painters Registration Boards and the Building Industry Development branch of the old Department of Housing and Works.

The Building Commission will be responsible for the regulation of buildings (building and plumbing codes), the registration of building practitioners and the development of policy and regulations concerning buildings within Western Australia, including sustainability measures in new and existing homes, in both residential and commercial sectors. These roles make the Building Commission the lead organisation involved with building issues in the State.

As a lead organisation for buildings, it is important that the Commission is involved in any building related issues, these include plumbing and water matters (including water efficiency/reuse) where they intersect with buildings.

It is worth noting that the creation of the Building Commission is in parallel with work being done at the national level to amalgamate the plumbing and building codes into a new National Construction Code. This may impact on the development of successful water efficiency policy in the future.